

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

W&T OFFSHORE, INC., AND
W&T ENERGY VI, LLC,

Plaintiffs,

v.

ENDURANCE ASSURANCE CORPORATION,
AND LEXON INSURANCE CO.

Defendants.

Civil Action No. 4:24-CV-03047

U.S. SPECIALTY INSURANCE
COMPANY,

Plaintiff,

v.

W&T OFFSHORE, INC., AND
W&T ENERGY VI, LLC,

Defendants.

Civil Action No. 4:24-CV-04113

UNITED STATES FIRE INSURANCE
COMPANY,

Plaintiff,

v.

W&T OFFSHORE, INC., AND
W&T ENERGY VI, LLC,

Defendants.

Civil Action No. 4:24-CV-04395

UNITED STATES PENN INSURANCE
COMPANY,

Plaintiff,

v.

W&T OFFSHORE, INC.,

Defendant.

Civil Action No. 4:24-CV-04400

**PLAINTIFFS' RESPONSE TO JOINT MOTION BY COUNSEL FOR THE SURETIES
TO REMOVE ATTORNEYS' EYES RESTRICTION ON *EX PARTE* NOTICE**

Plaintiffs, W&T Offshore, Inc. ("W&T Offshore") and W&T Energy VI, LLC ("W&T Energy") (collectively, "W&T"), file this Response to the Joint Motion by Counsel for the Sureties to Remove Attorneys' Eyes Restriction on *Ex Parte* Notice ("Sureties' Motion").

Counsel for the Sureties seek to remove the “Attorneys’ Eyes Only” restriction on the *Ex Parte* Notice (at Dkt 96)¹ to allow for the dissemination of its contents to their respective clients. The *Ex Parte* Notice, however, contains confidential information belonging to a third-party, not W&T. For this reason, W&T respectfully defers the Sureties’ requested relief to the wisdom of this Court. However, W&T believes that if the Court permits the surety companies to become apprised of the contents of the *Ex Parte* Notice, no further reason will exist for the parties to continue treating the information in Dkt. 96 as confidential and the Court should not impose restrictions on any party. In expressing this position, W&T does not purport to make any representation on behalf of any third-party.

Respectfully submitted,

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 INC. AND W&T ENERGY VI, LLC**

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¹ The Sureties’ Motion suggests that the Court has not reviewed the *Ex Parte* Notice. (Dkt. 100 at ¶3) W&T filed the *Ex Parte* Notice under seal in response to the Court’s Order (at Dkt. 91). The *Ex Parte* Notice should be available for the Court’s review at Dkt. 96. If, for some reason, the document is not readily accessible to the Court for review, W&T can provide a courtesy copy upon the Court’s request.

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